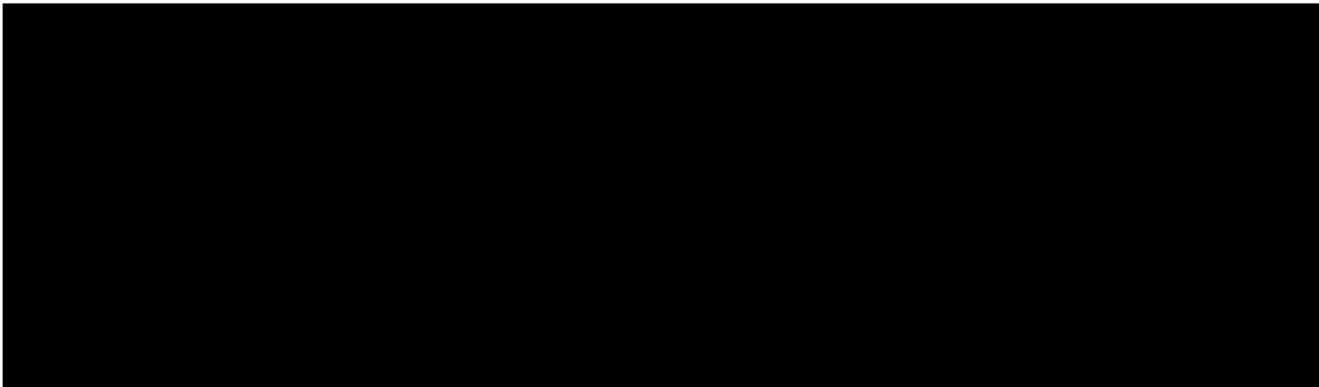


From: [Dan J. Garrison](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] July 28th, 2025 - Adjusting and Indexing Certain Regulatory Thresholds; Comment Request (RIN 3064-AG15)



I am strongly in favor of the increased asset threshold related to sections 363.1(a) and 363.5(a) (2) from \$500 million to \$1 billion, as are the remaining members of the executive team at Eaton Community Bank. Included in these sections is the need to separate the compilation function from the audit function. The \$500M threshold was implemented in 1991 and this amount, adjusted for inflation, is \$1.186 billion as of 2025; as such, the increased amount is in line with maintaining the original intent of the 1991 ruling. We are a small, community bank which has a mutual structure and, as such, has no stockholders so that we can work to maximize the benefit to our community through excellent rates and lower fees. Furthermore, have a relatively small accounting/finance staff (as is typical for institutions our size) which is already stretched to capacity, and compiling the financial statements and notes would be a significant overload on the team. Alternatively, we could have another audit firm than the one currently auditing but this would entail additional costs which would detract from our core mission as expressed above.

Please contact me at the phone or email below if you have any questions.

Dan Garrison
Chief Financial Officer
Eaton Community Bank

